

All Cases: Debtor(s) Brad Brooks

Case No. 19 B 09610 Chapter 7

All Cases: Moving Creditor Gateway One Lending & Finance

Date Case Filed April 3, 2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing    or Date Plan Confirmed   

Chapter 7: ☐ No-Asset Report Filed on   

☐ No-Asset Report not Filed, Date of Creditors Meeting April 7, 2019

1. Collateral
  - a. ☐ Home
  - b. ☒ Car Year, Make and Model: 2011 Ford Flex SUV
  - c. ☐ Other (describe) \_\_\_\_\_
2. Balance Owed as of Petition Date \$11,609.67  
Total of all other Liens against Collateral \$ 0.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in all cases) \$12,700.00
5. Default
  - a. ☒ Pre-Petition Default  
Number of mos. 2 Amount \$816.53
  - b. ☐ Post-Petition Defaults
    - i. ☐ On direct payments to the moving creditor  
Number of mos.    Amount \$
    - ii. ☐ On payments to the Standing Chapter 13 Trustee  
Number of mos.    Amount \$
6. Other Allegations
  - a. ☒ Lack of Adequate Protection §362(d)(1)
    - i. ☒ No insurance
    - ii. ☐ Taxes unpaid Amount \$
    - iii. ☒ Rapidly depreciating Asset
    - iv. ☐ Other (describe) \_\_\_\_\_
  - b. ☐ No Equity and not Necessary for an Effective Reorganization §362(d)(2)
  - c. ☐ Other "Cause" §362(d)(1) \_\_\_\_\_
    - i. ☐ Bad Faith
    - ii. ☐ Multiple Filings
    - iii. ☐ Other (describe) \_\_\_\_\_
  - d. Debtor's Statement of Intention regarding the Collateral
    - i ☒ Reaffirm
    - ii ☐ Redeem
    - iii ☐ Surrender
    - iv ☐ No Statement of Intention Filed

Dated: April 15, 2019

/s/ Kenneth B. Drost  
ATTORNEY FOR MOVANT